

REMARKS

Claims 1, 3, and 5 are now pending in this application. By this response to the Office Action dated August 22, 2007, claims 1 and 5 are amended, and claims 4, 6, and 7 cancelled without prejudice. Care has been taken to avoid the introduction of new matter. Favorable reconsideration of the application in light of the following comments is respectfully solicited.

In section 1 of the Office Action, the claims stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,304,254 (Johnson) in view of U.S. Patent No. 5,606,632 (Matsumoto) and further in view of “Curing Computer Instability with Hysteresis,” Vol. 34, Num. 7, Nov.-Dec. 2000, Analog Dialogue (Moghimi). Applicants respectfully traverse.

At page 4, line 10 to page 5, line 5, the Office Action asserts that the limitations previously recited in claim 4, and now presented in claim 1, are disclosed by col. 1, l. 65 – col. 2, l. 16 of Matsumoto, stating that it would have been obvious based on “the teaching of Matsumoto to include the use of storing data in multiple lookup tables” (page 5, ll. 4-5; *see also* page 3, l. 3). However, the mere disclosure of a plurality of look-up tables 61a through 61d does not suffice to disclose the recited *application* of a plurality of lookup tables.

The Matsumoto look-up tables 61a through 61d are employed for an entirely different purpose from either Johnson or the claims. Each look-up table corresponds to one of the original color images 51a through 51d, each table providing 256 entries with corresponding RGB values. *See* col. 4, ll. 63-67; Fig. 2 (illustrating 24-bit RGB values corresponding to 8-bit entry numbers). While claim 1 recites “lookup tables [which] are switched from one to another,” Matsumoto does not perform any switching of tables. Instead, the look-up tables in Matsumoto are used

concurrently, to simultaneously display all of the reduced color images on screen. *See* Fig. 8, step S9, col. 4, ll. 42-48 (stating that the number *t* of displayed images is equal to the number of look-up tables). While reducing the size of original images 51a through 51d for display, values in the look-up tables 61a through 61d are translated into reference table entries. *See* col. 6, l. 62 – col. 7, l. 11 (describing Fig. 8, step S2). Thus, although Matsumoto discloses a plurality of lookup tables, they are for an **unrelated purpose**, and Matsumoto does **not disclose switching** from one to another lookup table “according to information indicating an ambient temperature”, as recited in claim 1. Thus, the addition of the teachings of Matsumoto to those of Johnson would not make obvious the limitations of claim 1.

Further, there is no disclosure of the first *and* second storage devices recited by claim 1. In fact, the rejection of previously presented claim 4 does not identify where Matsumoto discloses these particular elements. Thus, the Office Action has not satisfied the initial burden of establishing a *prima facie* case of obviousness. Upon review by Applicants, Matsumoto only discloses look-up table storing unit 60. *See* Fig. 1. There is no disclosure of a “**second storage device**” along with the further limitations that it “**hav[e] a smaller storage capacity** than the first storage device,” and be “**for storing a lookup table read out from the first storage device**,” as recited by claim 1. Nor are lookup tables **read out** from a first storage device for storage in a second storage device **in correspondence with ambient temperature**, or some other equivalent, disclosed. Page 3, ll. 15-19 of the Office Action acknowledges that Johnson also does not disclose the above limitations. Thus, the above limitations are not disclosed by the cited art.

Without a disclosure of all of the recited limitations, including the functional relationships among elements recited by the claims, the cited art is unable to sustain the asserted

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prima facie case of obviousness under 35 U.S.C. § 103(a). Thus, Applicants respectfully request withdrawal of the rejection of independent claim 1, as well as dependent claims 3 and 5.

In view of the above remarks, Applicants respectfully submit that the application is in condition for allowance, and respectfully request the Examiner's favorable reconsideration as to allowance. The Examiner is invited to contact the Applicants' representative listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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